

Transcript of Genna Leigh Rose Weeks

1 (1 to 4)

Conducted on September 21, 2023

1	IN THE UNITED STATES DISTRICT COURT	1	A P P E A R A N C E S
2	FOR THE DISTRICT OF MARYLAND	2	
3	NORTHERN DIVISION	3	ON BEHALF OF THE PLAINTIFF:
4	-----x	4	WILLIAM C. HUDSON, ESQUIRE
5	ANDREEA IACOBETI, :	5	THE LAW OFFICE OF WILLIAM C. HUDSON
6	Plaintiff, :	6	9748 Stephen Decatur Highway, Suite 111
7	vs. : Case No.: 1:23-CV-1758	7	Ocean City, Maryland 21842
8	GENNA LEIGH ROSE WEEKS, :	8	410.957.3465
9	Defendant. :	9	
10	-----x	10	ON BEHALF OF THE DEFENDANT:
11		11	ANNE KELLEY HOWARD, ESQUIRE
12	Deposition of GENNA LEIGH ROSE WEEKS	12	BUDOW AND NOBLE, PC (ROCKVILLE)
13	Ocean City, Maryland	13	Twinbrook Metro Plaza
14	Thursday, September 21, 2023	14	12300 Twinbrook Parkway, Suite 540
15	10:19 a.m.	15	Rockville, Maryland 20852
16		16	301.654.0896
17		17	
18		18	
19		19	
20	Job No.: 506650	20	
21	Pages: 1 - 64	21	
22	Recorded By: Clinton Carmichael	22	
1	Deposition of GENNA LEIGH ROSE WEEKS,	1	C O N T E N T S
2	held at the offices of:	2	EXAMINATION OF GENNA LEIGH ROSE WEEKS PAGE
3		3	By Mr. Hudson 5
4		4	
5	THE LAW OFFICE OF WILLIAM C. HUDSON	5	
6	9748 Stephen Decatur Highway, Suite 111	6	E X H I B I T S
7	Ocean City, Maryland 21842	7	(None marked.)
8	410.957.3465	8	
9		9	
10		10	
11		11	
12		12	
13	Pursuant to Notice, before Clinton Carmichael,	13	
14	Notary Public in and for the State of Maryland.	14	
15		15	
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EXHIBIT

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<p style="text-align: right;">17</p> <p>1 Coastal Highway during the summer months as you</p> <p>2 are, is it fair to say that you're aware that</p> <p>3 there are lots of pedestrians and cyclists and</p> <p>4 people riding scooters throughout Ocean City</p> <p>5 during the summer months?</p> <p>6 A Yes.</p> <p>7 Q And was that day any different?</p> <p>8 A Like, was I less aware that day?</p> <p>9 Q No. Were -- were they prevalent on the</p> <p>10 day of the accident?</p> <p>11 MS. HOWARD: The conditions. He's</p> <p>12 asking about the conditions, not your awareness.</p> <p>13 Q Yeah.</p> <p>14 A Oh, yeah. There would've been. Yeah.</p> <p>15 Q Okay. If you would, start a few blocks</p> <p>16 prior to the intersection where the accident</p> <p>17 happened, and just tell me what you remember.</p> <p>18 A Okay. So I worked on 24th Street, so I</p> <p>19 pulled out of their parking lot and I went right,</p> <p>20 which would've been south, I believe, to go down</p> <p>21 that way. And I was just driving. I noticed the</p> <p>22 lights were flashing yellow and I slowed on the</p>	<p style="text-align: right;">19</p> <p>1 turning lane.</p> <p>2 Q And you were in the middle through</p> <p>3 lane, if you will?</p> <p>4 A Yes.</p> <p>5 Q And did you stay in that lane from the</p> <p>6 time you first saw the flashing yellow light until</p> <p>7 the accident happened?</p> <p>8 A Yes.</p> <p>9 Q Okay. Do you recall, as you were</p> <p>10 approaching the intersection, whether there were</p> <p>11 southbound vehicles to your right or left in close</p> <p>12 proximity?</p> <p>13 A Do you mean people traveling the same</p> <p>14 way as me?</p> <p>15 Q Yeah.</p> <p>16 A Okay. Yes, there was somebody stopped</p> <p>17 at the left turn lane, at the light, and then</p> <p>18 there was a car to my left, but they were behind</p> <p>19 me not going -- they weren't ahead of me and they</p> <p>20 weren't going the same speed as me. And then</p> <p>21 there was a car to my right, behind me, and there</p> <p>22 was a car to my right that had gone through the</p>
<p style="text-align: right;">18</p> <p>1 brake to process flashing yellow. And I looked at</p> <p>2 the intersection light going the other way. And I</p> <p>3 realized they have flashing red and I stopped and</p> <p>4 processed, They have red, I have yellow, so it's</p> <p>5 not a four-way stop. I can keep going.</p> <p>6 Q Okay. Approximately how far do you</p> <p>7 think you were from the intersection when you</p> <p>8 first observed the flashing yellow light?</p> <p>9 A So it's pretty close to where I worked.</p> <p>10 So I would say I was probably a block or so away</p> <p>11 from it when I started to process, do I completely</p> <p>12 come to a stop? Because I would've had enough</p> <p>13 time to stop completely if we were flashing red.</p> <p>14 So probably a block or two.</p> <p>15 Q Okay.</p> <p>16 A Street or two.</p> <p>17 Q Do you recall what lane you were</p> <p>18 traveling in when you first saw the flashing</p> <p>19 yellow light?</p> <p>20 A So there's a left turning lane, there</p> <p>21 was a left lane, then I was in the middle lane,</p> <p>22 and then there was a right lane, and then a right</p>	<p style="text-align: right;">20</p> <p>1 light already.</p> <p>2 Q Okay. And are you basing that on your</p> <p>3 memory of the events of that day or on some</p> <p>4 materials you have seen since the accident?</p> <p>5 A That's based on my memory.</p> <p>6 Q Okay. Do you remember any of the</p> <p>7 identifying features of any of those vehicles you</p> <p>8 described, make, model, color, vehicle type,</p> <p>9 anything such as that?</p> <p>10 A Not 100 percent, but I do remember the</p> <p>11 car in the left turning lane was a darker colored,</p> <p>12 not quite an SUV as big as mine, but not a car, to</p> <p>13 the best of my knowledge.</p> <p>14 Q And that's the vehicle that you said</p> <p>15 was stopped in the left turn lane?</p> <p>16 A Yes.</p> <p>17 Q Okay. Do you remember any of the</p> <p>18 identifying features of any of the other vehicles</p> <p>19 that you earlier talked about?</p> <p>20 A No.</p> <p>21 Q Okay. Now you indicated earlier that</p> <p>22 when you saw the flashing yellow light, you, I</p>

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<p>21</p> <p>1 think also were able to perceive that the lights</p> <p>2 controlling the intersecting roads were flashing</p> <p>3 red; is that correct?</p> <p>4 A I saw them flashing red, yes.</p> <p>5 Q Okay. And the significance that you</p> <p>6 said you attached to that was that it -- it --</p> <p>7 that those -- the -- the -- the traffic on those</p> <p>8 roads was required to stop so that you weren't,</p> <p>9 you could proceed; correct?</p> <p>10 A Correct. I thought flashing red at all</p> <p>11 fours means we all stop and it becomes a four-way</p> <p>12 stop, but the yellow, you proceed and there --</p> <p>13 cars at that intersection were stopped.</p> <p>14 Q Okay. All right. What other meaning</p> <p>15 did you attach to the flashing yellow light, in</p> <p>16 terms of what the expectations of you as an</p> <p>17 approaching motorist would be?</p> <p>18 A I said I slowed.</p> <p>19 Q Okay. Other than slowing, were there</p> <p>20 any other duties that you feel were attendant to</p> <p>21 that flashing yellow light as an approaching</p> <p>22 motorist?</p>	<p>23</p> <p>1 northwest side of that intersection, there is a</p> <p>2 church; correct?</p> <p>3 A Correct.</p> <p>4 Q And on the southwest side, there's a</p> <p>5 CVS; correct?</p> <p>6 A Yes.</p> <p>7 Q The pedestrians that you saw on the</p> <p>8 west side corner, were they on the -- the north</p> <p>9 side where the church is or the south side where</p> <p>10 the CVS is?</p> <p>11 A Where the CVS is.</p> <p>12 Q Okay. Do you remember approximately</p> <p>13 how many pedestrians were standing there?</p> <p>14 A I don't remember the exact number, but</p> <p>15 I could tell you it was more than two.</p> <p>16 Q Okay. And is it your recollection that</p> <p>17 they were just standing there, they weren't in the</p> <p>18 process of crossing?</p> <p>19 MS. HOWARD: Objection to the</p> <p>20 definition of the process.</p> <p>21 MR. HUDSON: I get it.</p> <p>22 MS. HOWARD: Okay.</p>
<p>22</p> <p>1 A I'm not sure I understand.</p> <p>2 Q For good reason, that was a terrible</p> <p>3 question.</p> <p>4 A Yeah.</p> <p>5 Q When -- when you approach a flashing</p> <p>6 yellow light, other than slowing down, what do you</p> <p>7 consider your other duties as a driver?</p> <p>8 A You proceed with caution, which is how</p> <p>9 I evaluated the situation of them -- the other</p> <p>10 drivers that were stopped and the flashing red</p> <p>11 light, and the -- there were pedestrians on the</p> <p>12 corner of where 17th Street is, outside the CVS,</p> <p>13 that were also stopped.</p> <p>14 Q Do you remember seeing pedestrians on</p> <p>15 the bay side --</p> <p>16 A Yes.</p> <p>17 Q -- of Coastal Highway who were waiting</p> <p>18 to cross?</p> <p>19 A I don't know if they were waiting to</p> <p>20 cross, but they were standing on the corner, not</p> <p>21 in the crosswalk.</p> <p>22 Q Now on the north side of that -- on the</p>	<p>24</p> <p>1 BY MR. HUDSON:</p> <p>2 Q Did they appear to be standing still or</p> <p>3 did they appear to be in motion when you saw them?</p> <p>4 A They were standing still.</p> <p>5 Q Okay. Do you recall seeing any</p> <p>6 pedestrians on the east side of the intersection,</p> <p>7 the ocean side of the intersection?</p> <p>8 A Okay. No.</p> <p>9 Q As you approached the intersection, you</p> <p>10 mentioned the car that was stopped in the left</p> <p>11 turn lane, were there any other vehicles stopped</p> <p>12 on southbound Coastal Highway at that intersection</p> <p>13 as you approached it, or was it just that one car?</p> <p>14 A To my knowledge, just that one car.</p> <p>15 Q Okay. And was that one car in the left</p> <p>16 turn lane stopped for the entire duration of --</p> <p>17 from the time you first saw the flashing light</p> <p>18 until the time the accident happened?</p> <p>19 A I don't remember if they were stopped</p> <p>20 at the time I saw the flashing light, like, from</p> <p>21 when I first saw the flashing light.</p> <p>22 Q Okay. Do you remember when</p>

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<p>45</p> <p>1 Q Okay. I -- I understand that she was</p> <p>2 first, but I was asking whether you were able to</p> <p>3 observe whether they were moving at approximately</p> <p>4 the same speed, or that the cyclist was moving</p> <p>5 faster or slower than the pedestrian. And if you</p> <p>6 didn't make any such observations, that's fine,</p> <p>7 too.</p> <p>8 A I didn't even think to look at</p> <p>9 something like that.</p> <p>10 Q Okay. Did you notice anything about</p> <p>11 the pedestrian's pace, if you will, whether she</p> <p>12 appeared to be walking casually or at a very</p> <p>13 deliberate, fast pace?</p> <p>14 A I mean, like, I didn't see her walking</p> <p>15 at all, I saw her in front of my car, so I don't</p> <p>16 know.</p> <p>17 Q Okay. What do you remember observing</p> <p>18 about her in terms of her appearance? What she</p> <p>19 was wearing, what she was carrying, et cetera?</p> <p>20 A I know she was wearing all black.</p> <p>21 That's all I really -- she's tan skin, dark hair.</p> <p>22 Okay.</p>	<p>47</p> <p>1 clarify.</p> <p>2 MR. HUDSON: Now I'm confused.</p> <p>3 MS. HOWARD: I guess -- I -- I think</p> <p>4 part of the issue, and I think you know this, is</p> <p>5 my -- my client was able to see your client after</p> <p>6 the impact.</p> <p>7 MR. HUDSON: Understood.</p> <p>8 MS. HOWARD: So when did she observe</p> <p>9 what?</p> <p>10 BY MR. HUDSON:</p> <p>11 Q Yeah. Okay. I -- I -- I'm not</p> <p>12 distinguishing between what you saw before versus</p> <p>13 after the impact. I just want to know whatever</p> <p>14 observations you made at any time regarding</p> <p>15 whether she was carrying anything.</p> <p>16 A Yes. She had a phone and some kind of</p> <p>17 pen that was assumed to be hers at the scene by</p> <p>18 the people that picked it up.</p> <p>19 Q Okay. And when you say pen, you mean a</p> <p>20 writing pen?</p> <p>21 A Like a -- I don't know, a smoke pen, I</p> <p>22 don't know what it was exactly.</p>
<p>46</p> <p>1 Q Did it appear that she was wearing some</p> <p>2 sort of uniform?</p> <p>3 A I think it was more like workout</p> <p>4 clothes.</p> <p>5 Q Okay.</p> <p>6 A Not a uniform, but I'm not -- I'm not</p> <p>7 100 percent. I didn't analyze in that moment.</p> <p>8 MR. HUDSON: It's 11:00.</p> <p>9 THE WITNESS: I'm good for now. I'll</p> <p>10 let you know.</p> <p>11 MR. HUDSON: Okay.</p> <p>12 THE WITNESS: I'll feel it.</p> <p>13 BY MR. HUDSON:</p> <p>14 Q Do you recall whether she was carrying</p> <p>15 anything?</p> <p>16 A Like, before or after?</p> <p>17 Q At any time?</p> <p>18 A I know she had --</p> <p>19 MS. HOWARD: I just want to make sure</p> <p>20 it's carrying -- did you observe it? There was --</p> <p>21 I think she's referring to when she observed, you</p> <p>22 might be referring to carrying, or not? Just</p>	<p>48</p> <p>1 Q Okay.</p> <p>2 A A vape or a -- I don't know.</p> <p>3 Q Okay. And you understand this based</p> <p>4 upon discussions you had with others at the scene,</p> <p>5 or did you -- did you see the pen?</p> <p>6 A They picked it up out of the street, by</p> <p>7 they, meaning a bystander, and said this was hers,</p> <p>8 and handed it to the officer.</p> <p>9 Q Okay. And --</p> <p>10 A And I did see it. I was standing there.</p> <p>11 Q Okay. And you also mentioned a phone?</p> <p>12 A Yeah, it was shattered.</p> <p>13 Q Okay. And tell me what you know about</p> <p>14 that phone.</p> <p>15 A I just know that it was found in the</p> <p>16 street.</p> <p>17 Q Okay.</p> <p>18 A I don't know where, I just know that</p> <p>19 the person that picked it up handed them to the</p> <p>20 officers.</p> <p>21 Q Do you know who that person was?</p> <p>22 A I don't know that person. It was just</p>

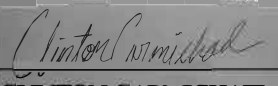

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<p style="text-align: right;">53</p> <p>1 don't remember.</p> <p>2 Q Okay. Did you have any communications</p> <p>3 with her at all?</p> <p>4 A No.</p> <p>5 Q Did she appear to be unconscious or was</p> <p>6 she alert?</p> <p>7 A I could hear her making noises. I went</p> <p>8 to get my phone and I had heard people yell that</p> <p>9 she wasn't breathing. There was a lot of people</p> <p>10 that came.</p> <p>11 Q Did you see any visible signs of injury?</p> <p>12 A I saw blood.</p> <p>13 Q And where did the blood appear to be</p> <p>14 coming from?</p> <p>15 A Her head.</p> <p>16 Q Okay. Were you able to observe any</p> <p>17 injuries to her head other than the blood?</p> <p>18 A No, I just saw the blood.</p> <p>19 Q Were you able to feel the impact?</p> <p>20 A Feel it, like feel my car jerk you mean?</p> <p>21 Q Yeah.</p> <p>22 A A little, yeah.</p>	<p style="text-align: right;">55</p> <p>1 observe that the pedestrian crossing lights were</p> <p>2 not working? I assume it was after the accident;</p> <p>3 is that correct?</p> <p>4 A It was.</p> <p>5 Q In your answers to interrogatories, you</p> <p>6 indicated that your fiance Dylan arrived at the</p> <p>7 scene 15 minutes or so after the accident; is that</p> <p>8 correct?</p> <p>9 A Yeah, sometime after.</p> <p>10 Q How did he learn about the accident?</p> <p>11 A I asked the officer if I could call him.</p> <p>12 Q Okay. Now you earlier indicated that</p> <p>13 you called 911. And with the officer's approval,</p> <p>14 you later called your fiance. Did you make any</p> <p>15 other calls or send any other texts, or any texts</p> <p>16 in the 15 or so minutes after the accident?</p> <p>17 A I don't think so. If anything, I</p> <p>18 would've texted – and I don't remember, I just</p> <p>19 know myself, I would've texted his mom that I was</p> <p>20 going to be late.</p> <p>21 Q Have you looked at your phone since the</p> <p>22 accident to see what texts or what phone usage you</p>
<p style="text-align: right;">54</p> <p>1 Q Are you able to estimate the speed at</p> <p>2 which you were traveling at the point of impact?</p> <p>3 A At the exact point, no, but I know that</p> <p>4 I had slowed from the lights, so I would say,</p> <p>5 yeah, I'd slowed at the lights.</p> <p>6 Q Did you have any communications with</p> <p>7 the cyclist at all?</p> <p>8 A No.</p> <p>9 Q Did you make any observations as to</p> <p>10 whether my client was using her cell phone at the</p> <p>11 time of the impact?</p> <p>12 A I didn't –</p> <p>13 Q You, personally.</p> <p>14 A I personally did not.</p> <p>15 Q Okay. What observations did you make</p> <p>16 relative to the functioning of the pedestrian</p> <p>17 crossing signs on the day of the –</p> <p>18 A It was off, it was out, wasn't working.</p> <p>19 Q And when you say it wasn't working, it</p> <p>20 wasn't displaying anything?</p> <p>21 A Nothing.</p> <p>22 Q Okay. And at what point did you</p>	<p style="text-align: right;">56</p> <p>1 had in close proximity to the accident?</p> <p>2 A I didn't.</p> <p>3 Q Okay. When the accident happened, were</p> <p>4 you using your cellular device, whether it was</p> <p>5 talking on it, texting on it, social media, or</p> <p>6 anything such as that?</p> <p>7 A I was not.</p> <p>8 Q Did you have it with you?</p> <p>9 A I did have it with me.</p> <p>10 Q Okay. When Dylan arrived, did you tell</p> <p>11 him what had happened?</p> <p>12 A So when – I don't know if I told him</p> <p>13 or if the paramedic told him, I can't remember.</p> <p>14 Q Okay. Other than Dylan, did you know</p> <p>15 anybody else at the scene?</p> <p>16 A No.</p> <p>17 Q Are you aware of anybody who witnessed</p> <p>18 any part of the accident?</p> <p>19 A There was a man, I don't know his name,</p> <p>20 but I know – there was a lot of people that</p> <p>21 witnessed it, but there was a man that spoke to</p> <p>22 the officer.</p>

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<p>57</p> <p>1 Q Mr. Beagle, does that sound right?</p> <p>2 A I really don't know his name. Yeah, I</p> <p>3 didn't get anything -- any information from him.</p> <p>4 Q Other than that man, are you aware of</p> <p>5 the identities of anyone else who witnessed any</p> <p>6 part of the accident?</p> <p>7 A No.</p> <p>8 Q Okay. As you approached the</p> <p>9 intersection, was there anything that distracted</p> <p>10 you from the roadway ahead of you?</p> <p>11 A Aside from the lights and processing</p> <p>12 that, no.</p> <p>13 Q Okay. And -- and the -- the reason I</p> <p>14 ask is that the accident report itself, I think at</p> <p>15 some point in time says that a contributing factor</p> <p>16 was distracted -- distraction. He wasn't there</p> <p>17 obviously, and it may be wrong, I just have to ask</p> <p>18 if you recall being distracted by anything.</p> <p>19 A Just the biker and the lights before</p> <p>20 the impact with the -- your client.</p> <p>21 Q Okay. Did you post anything on any</p> <p>22 social media about the accident?</p>	<p>59</p> <p>1 A But I don't recall that -- getting any</p> <p>2 additional work done to fix anything.</p> <p>3 Q Do you have any reason to think that as</p> <p>4 a result of the accident there was any damage to</p> <p>5 the side, either the driver's side or the</p> <p>6 passenger side of your vehicle, or was it limited</p> <p>7 to the front?</p> <p>8 A By the sides, you mean where the doors</p> <p>9 are?</p> <p>10 Q Yeah.</p> <p>11 A Yeah, no.</p> <p>12 Q Hypothetically, if in addition to the</p> <p>13 vehicle that you earlier described that was</p> <p>14 stopped in the left turn lane, there had been</p> <p>15 other vehicles on Southbound Coastal Highway that</p> <p>16 were stopped at that intersection, either in the</p> <p>17 left lane or the right lane, what is your</p> <p>18 understanding as to what you are required to do in</p> <p>19 response to that?</p> <p>20 MS. HOWARD: Note my objection. You</p> <p>21 can answer.</p> <p>22 THE WITNESS: Hypothetically, if there</p>
<p>58</p> <p>1 A No.</p> <p>2 Q The damage to your vehicle, was it</p> <p>3 limited to the driver's side headlight, perhaps</p> <p>4 the bumper and grill, and the hood on that side of</p> <p>5 the vehicle, was -- was there any other damage?</p> <p>6 A Not that I'm aware of.</p> <p>7 Q Okay. In the materials that were</p> <p>8 provided by Counsel, there were some photographs</p> <p>9 of your vehicle on which they appeared to have</p> <p>10 drawn some circles on some damage on the side of</p> <p>11 the vehicle that I assume is completely unrelated</p> <p>12 to this accident. It -- it looked like there was</p> <p>13 some paint -- some door marks that may have been</p> <p>14 fixed at the same time. Do you recall whether you</p> <p>15 had any additional work done?</p> <p>16 A I didn't have any additional work done.</p> <p>17 I took the car to Caliber Collision, like State</p> <p>18 Farm said, and they just fixed it and I picked it</p> <p>19 up, but they didn't communicate with me about what</p> <p>20 needed fixed. I had like a paper that I had to</p> <p>21 give them.</p> <p>22 Q Okay. Do you --</p>	<p>60</p> <p>1 were other cars stopped on the right and the left</p> <p>2 of me and the light was still flashing yellow? Is</p> <p>3 that --</p> <p>4 BY MR. HUDSON:</p> <p>5 Q The right or left.</p> <p>6 A Yeah. Hypothetically, there's cars</p> <p>7 stopped at right or left, aside from the left turn</p> <p>8 lane, and it's still flashing yellow? What is my</p> <p>9 duty, or what would I have done?</p> <p>10 Q What -- what -- what do you believe the</p> <p>11 rules of the road would require of you in that</p> <p>12 scenario?</p> <p>13 MS. HOWARD: So again, objection.</p> <p>14 Answer if you can.</p> <p>15 THE WITNESS: Yeah. The rules of the</p> <p>16 -- I would still think if I'm going by the rules</p> <p>17 of the road, that flashing yellow means stop and</p> <p>18 proceed with caution. But to be honest, if</p> <p>19 everyone else has stopped, I don't know if there's</p> <p>20 a, like, law that everyone stopped, you stop on</p> <p>21 the left and right, I don't know.</p> <p>22 Q Okay. Well, let me add something to</p>

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<p>61</p> <p>1 that scenario. Again, hypothetically, if in</p> <p>2 addition to that car that was stopped in the left</p> <p>3 turn lane, there had been a car stopped in the</p> <p>4 lane between the two of you, so that it was</p> <p>5 stopped adjacent to that car, do you think that</p> <p>6 the rules of the road would've required that you</p> <p>7 also stop or come close to stopping to make sure</p> <p>8 that there's not a pedestrian reason why those two</p> <p>9 vehicles have stopped?</p> <p>10 MS. HOWARD: Note my objection. You</p> <p>11 can answer.</p> <p>12 THE WITNESS: I think you -- yeah, you</p> <p>13 come close to stopping to observe, yeah.</p> <p>14 Q Okay. Did you do that in this case?</p> <p>15 And I -- I realize the hypothetical assumes that</p> <p>16 there's another vehicle stopped in the through</p> <p>17 lane to your left.</p> <p>18 A I did slow. I didn't come to a stop,</p> <p>19 but I did slow.</p> <p>20 MR. HUDSON: Okay. I have no further</p> <p>21 questions. Thank you.</p> <p>22 THE WITNESS: Thank you.</p>	<p>63</p> <p>1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC</p> <p>2 I, Clinton Carmichael, the officer</p> <p>3 before whom the foregoing proceedings were</p> <p>4 taken, do hereby certify that any witness(es) in</p> <p>5 the foregoing proceedings were fully sworn;</p> <p>6 that the proceedings were recorded by me and</p> <p>7 thereafter reduced to typewriting by a</p> <p>8 qualified transcriptionist; that said digital</p> <p>9 audio recording of said proceedings are a</p> <p>10 true and accurate record to the best of my</p> <p>11 knowledge, skills, and ability; and that I am</p> <p>12 neither counsel for, related to, nor employed</p> <p>13 by any of the parties to this case and have</p> <p>14 no interest, financial or otherwise, in its</p> <p>15 outcome.</p> <p>16</p> <p>17 </p> <p>18 CLINTON CARMICHAEL,</p> <p>19 NOTARY PUBLIC FOR THE STATE OF MARYLAND</p> <p>20</p> <p>21</p> <p>22</p>
<p>62</p> <p>1 MS. HOWARD: I have no questions.</p> <p>2 We're going to read and sign, and I'm taking a</p> <p>3 copy, please. And I can walk you out.</p> <p>4 THE WITNESS: Okay.</p> <p>5 MR. HUDSON: And you didn't need a</p> <p>6 break.</p> <p>7 THE WITNESS: Yep. That's what I was</p> <p>8 like, maybe I can push it to 11:30.</p> <p>9 THE REPORTER: Off the record.</p> <p>10 (Off the record at 11:21 a.m.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>64</p> <p>1 CERTIFICATE OF TRANSCRIBER</p> <p>2 I, Brandi McLean, do hereby certify</p> <p>3 that this transcript was prepared from the digital</p> <p>4 audio recording of the foregoing proceeding; that</p> <p>5 said proceedings were reduced to typewriting under</p> <p>6 my supervision; that said transcript is a true and</p> <p>7 accurate record of the proceedings to the best of</p> <p>8 my knowledge, skills, and ability; and that I am</p> <p>9 neither counsel for, related to, nor employed by</p> <p>10 any of the parties to the case and have no</p> <p>11 interest, financial or otherwise, in its outcome.</p> <p>12</p> <p>13</p> <p>14 </p> <p>15 BRANDI MCLEAN</p> <p>16 PLANET DEPOS, LLC</p> <p>17 10/5/2023</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>